Before the

FEDERAL COMMUNICATION COMMISSION

Washington, D.C. 20554

In the Matter of		
Comments being filed by Michael Radio Company, LLC in DA 25-219 Released March 12, 2025 Regarding Delete, Delete, Delete All Broadcast Stations	)	GN Docket No. 25-133

COMMENTS

Michael Radio Company, LLC ("MRC") is hereby respectfully filing comments in the above noted Federal Communications Commission ("FCC") GN Docket No. 25-133 released in DA 25-236 dated March 18th, 2025, "Delete, Delete, Delete".

MRC is the licensee of several smaller market radio stations in Wyoming and Pennsylvania. MRC's sole LLC member, Victor A Michael, Jr. ("Michael"), is a longtime radio station owner (since October 1985) as well as a longtime broadcast engineer and technical consultant (since 1980). With this 45 years of broadcast industry experience, MRC and Michael feel they are in a well-suited position to make comments in this proceeding.

MRC would like to comment on many current FCC rule and regulations that it feels could be eliminated or modified to help allow broadcasters, especially smaller market broadcasters such as MRC, the ability for them to efficiently operate their stations and/or expand their operations.

MRC full respects the need for most of the current FCC rules and regulations, MRC would like to suggest the possible elimination or modification of some off the Commissions

existing rules that it feels may help broadcasters in general, without jeopardizing the need for stations to continue to serve the Public Interest or necessity.

The first rule that MRC would like the FCC to examine is 46 CFR § 73.207 Minimum distance between stations. MRC believes that there would be a great benefit to maximize the use of the FM broadcast non-reserved band by eliminating the minimum distance separation requirements in kilometers between co-channel, and the pertinent 6 adjacent channels. MRC proposes that the Commission implement a system like the rules allowed for by FM non-commercial stations operating in the "reserved band" portion of the FM broadcast spectrum. Reserved band FM stations are licensed by contour overlap only, with the exception of I.F. spaced stations and station that must conform to mileage separations on channel 218, 219 and 220 to non-reserved band stations.

MRC would also like to propose as part of the elimination of 73.207 that station class assignments would also no longer be needed under 47 CFR § 73.210. The current system of assigning classes of stations affords some stations operating with less than maximum class facilities. Greater protection from other stations can keep other stations from improving their potential coverage because of a less than maximum same channel or adjacent channel station operating with less than the maximum allow by a specific allocation class assignment. MRC proposes a minimum 60 dBμ average coverage distance of 9 kilometers (like reserve band NCE FM's) and a maximum Effective Radiated Power ("ERP") of 100 kilowatts and antenna Height Above Average Terrain ("HAAT") or the maximum facilities currently allowed for by class C stations. With all other stations only being limited to the current standards of prohibit contour overlap under CFR 47 § 73.215. Any existing contour overlaps would be grandfathered.

MRC would also propose the elimination of the three "Zones" for FM stations under 47 CFR § 73.205 as being unnecessary with the elimination of FM Classes.

The next rule MRC should be eliminated would be the current table of FM allotments, 47 CFR § 73.202. Once again, FM stations operating in the reserved FM band are not assigned by this reservation of channels system under 73.202. Because FM allotments are part of the Commission's rules, it requires that Petitions for Rulemaking be required to make changes in channels listed under 73.202. This can be a lengthy process and can delay potential upgrades by other stations. It also ties up spectrum for sometimes years awaiting the current spectrum auction system for awarding new FM stations. Many allotments go unsold for years with Commission FM broadcast auctions. Once again wasting available FM spectrum.

MRC is also proposing to modify 47 CFR § 73.315(a) to change the required community coverage contour requirement from the current 70 dBμ or 3.16 mV/m to 60 dBμ or 1.0 mVm. This would mirror the requirement for FM stations operating in the reserve band. This would allow for stations more flexibility in locating usable translator site locations. It would also negate the need for some stations to use an "Alternative Coverage method" which the Commission allows with Longley Rice coverage modeling and reduced 60 dBμ contour (F50,50) required contour coverage.

MRC would like the Commission to consider rescinding the restrictions for AM and FM relocations under the provisions of MB Docket No. 09-52, RM-11528, otherwise known as "Rural Radio". Most all of the available broadcast spectrum in larger metropolitan or "Urbanized Area" has been utilized. This Docket, while maybe well meaning at the time, came a bit too late to be effective. Most of the "move-ins" done by smaller market stations to larger markets had already been completed by time the new restrictions under "Rural Radio" were

adopted. It does, however, restrict some stations, especially struggling AM stations to maybe increase their population coverage with potential transmitter site moves to larger areas.

MRC understands these proposals it is offering might cause a flurry of applications for new and/or upgrade applications. MRC suggests that a filing window be opened for new and upgrade applications by FM stations in the non-reserved band. Once received, conflicting applications be put into Mutually Exclusive groups ("MX Groups"). A time period then being allowed for settlements and technical solutions for applicants. Any remaining MX group applications that can't be resolved would be scheduled for auction. This process has been similarly utilized with new AM station application windows. Also, like new NCE FM applications except for any remaining MX group applications being resolved by a points system.

MRC feels that if these technical rules are eliminated and revamped as proposed, a more efficient and improved FM broadcast band use would be available. It would allow current FM stations to maximize their coverage areas. Higher FM signals level would improve reception by the listening public.

Other rules MRC would like the Commission to consider is the current limitations of Cross-Ownership between AM, FM, TV and Newspapers. This has long been considered being revamped. With the new digital distribution systems for news and information (Internet, Podcasts, Satellite Radio and TV, social media) it is time to allow common ownership between these broadcast stations and local newspapers to allow for improved news coverage stemming from these consolidated media services.

Lastly MRC would like to propose a modification to the Public File requirements for broadcasters to change the required Program and Issues filings to be changed to annual reports in place of the current quarterly filings.

Respectfully submitted,

Victor A Michael, Jr.
Sole Member/Technical Consultant
Michael Radio Company, LLC
1418 Bradley Avenue
Cheyenne, WY 82001
307-772-1322
vicmichael@rf-towers.com

Dated April 11, 2025